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May 3, 2024

**VIA ECF**

Pamela K. Chen, U.S.D.J.  
United States District Court, Eastern District of New York  
225 Cadman Plaza East, Courtroom 4F North  
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*  
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC (collectively, “Defendants”) in the above-referenced matter and write to request permission to communicate with all law firms on the Enjoined Customer List identified by plaintiff in its latest contempt submission as law firms which Defendants allegedly serviced in violation of Court Order.

These law firms are key witnesses in the contempt proceeding, and Defendants’ counsel must have the opportunity to communicate with them with respect to plaintiff’s allegations in order to defend their clients. We note that by Minute Order dated April 15, 2024, your Honor permitted us to communicate with one such law firm regarding plaintiff’s contempt allegations. Since plaintiff has identified additional law firms, we request permission to communicate with those firms as well.

Respectfully,

*/s/ Jonathon D. Warner*

JDW/ks

cc: All Counsel (via ECF)